

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
(Alexandria Division)

WILHELMINA REUBEN-COOKE)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 1:08cv1102
)	Hon. Leonie M. Brinkema
BOARD OF TRUSTEES OF THE)	Hon. Ivan D. Davis
UNIVERSITY OF THE DISTRICT)	
OF COLUMBIA, <i>et al.</i> ,)	
)	
Defendants.)	
)	

PLAINTIFF'S RULE 26(a)(3) PRETRIAL DISCLOSURES

Pursuant to Fed.R.Civ.P. 26(a)(3) and this Court's Order of February 18, 2009, Plaintiff hereby makes the following pretrial disclosures:

A. Plaintiff's Witnesses

(All addresses and contact information previously provided)

	<u>WILL CALL</u>	<u>MAY CALL</u>
ANDERSON, Melainie		X
BARNES, Malcolm	X	
BARRAS, Jonetta Rose	X	
BORLANDOE, Janice		X
BRODERICK, Katherine (Shelly)	X	
COOKE, Edmund	X	
DYKE, James W.	X	
FULLER, Carlynn		X

	<u>WILL CALL</u>	<u>MAY CALL</u>
GOLD, M.D., Liza	X	
GROGAN, David		X
HALL, Sydney	X	
HARVEY, Eumon		X
JACKSON, Stanley	X	
JOHNSON, Wilmer	X	
JOLLY, Ernest		X
JUMPER, Barbara	X	
LANDON, Johnnie	X	
LANGENBERG, Donald	X	
MINUS, Bertha		X
MUTNICK, Myles	X	
MYERS, Patricia	X	
MYERS, William		X
NOEL, Antonio		X
PENDELTON, Ernesta		X
PETTY, Rachel	X	
POLLARD, William		X
PRESCOTT, II, Hermann (Terry)	X	
REUBEN-COOKE, Wilhelmina	X	
SESSOMS, Allen L.		X
SIDWELL, Rollin		X

	<u>WILL CALL</u>	<u>MAY CALL</u>
SLACK, John		X
SOLOMON, Clemie		X
WATTS, David	X	
WILLOUGHBY, Charles		X
WYCHE-MOORE, Gloria	X	
Custodian of Records, University of the District of Columbia	X	
Corporate Designee, University of The District of Columbia		X
Custodian of Records, Examiner.com	X	
Corporate Designee, Examiner.com		X

Any individual who gave testimony in a deposition in this case.

Any witness identified by any other party not objected to by the Plaintiff.

Any physician or health care provider identified in the parties' Initial Disclosures or Interrogatory Responses.

If any of the above-named witnesses are not available for trial, Plaintiff shall designate, pursuant to Local Rule 30 (F), portions of their deposition. At this time, Plaintiff is not aware of any witness being unavailable.

B. Documentary Evidence (demonstrative exhibits may be introduced)

An "*" denotes those exhibits Plaintiff MAY introduce. No * denotes those Plaintiff intends to introduce.

1. Resume – Wilhelmina M. Reuben-Cooke
2. Letter from William L. Pollard, President, to Wilhelmina Reuben-Cooke, dated 7/10/2003.

3. University of the District of Columbia Work Force Development Program organizational chart, last updated 11/7/2006.
4. *The Role of University of the District of Columbia In Workforce Development in the District of Columbia: A Policy Paper.*
5. Workforce Development Initiative Policies and Procedures Committee
6. University of the District of Columbia Workforce Development Initiative Satellite Programs
7. COES Workforce Development Programs and Courses
8. Articles of The University Senate of the University of the District of Columbia.
9. Request for Applications – Office of the Provost and Vice President for Academic Affairs; Title: Workforce Development and Community College Feasibility Study, Release Date 3/1/2005.
10. Memorandum to Ms. Reuben-Cooke from Rachel M. Petty, regarding withdrawal of the Health & Physical Education Program, dated 5/27/2004.
11. Memorandum to Ms. Reuben-Cooke from Sydney O. Hall, Wilmer L. Johnson and John Slack, regarding concerns from the Meeting to Correct and Reinstate the Health Education Program, dated 10/18/2004.
12. Memorandum to Sydney Hall, Wilmer Johnson and John Slack from Ms. Reuben-Cooke re: meeting on Reinstatement of Health Education Program for SEO, dated 11/3/2004.
13. Memorandum from Sydney Hall to Ms. Reuben-Cooke regarding removal of the Health and Physical Education Program, dated 7/12/2005.
14. Memorandum from Ms. Reuben-Cooke to Sydney Hall, regarding Health & Physical Education Program and Selection, dated 10/11/2005.
15. Email from Johnnie Landon to Patricia Myers (cc to William Pollard), dated 2/1/2006.
16. Agenda for Provost Meeting with the President, dated 5/8/2006.
17. University of the District of Columbia, Summer Term Faculty Appointment re: Sydney Hall, dated 6/8/1994.
18. University of the District of Columbia Adjunct Faculty Appointment of Sydney Hall, dated 2/1/2008.

19. Memorandum from Rolin Sidwell to Ms. Reuben-Cooke re: Use Agreement, dated 2/23/2006.
20. Report of the University of the District of Columbia Workforce Development Initiative Pilot Satellite Programs, dated 24 February 2006.
21. Memorandum from Sydney Hall to William Pollard re: Health and Physical Education Program, dated 4/4/2006.
22. Communication from Sydney Hall to Dr. William Pollard re: Misconduct in Withdrawal Health and Physical Education Program, dated 4/10/2006.
23. Communication from Sydney Hall, Wilmer Johnson and John Slack to Dr. William Pollard, regarding Terms of Agreement at Meeting of April 24, 2006, dated 4/26/2006.
24. Note to Dr. Pollard dated 5/25/2006.
25. Memorandum from Rolin Sidwell to Ms. Reuben-Cooke re: Program Staffing, dated 6/19/2006.
26. Letter from Sydney Hall to Dr. William Pollard, dated 7/31/2006.
27. Facsimile from Yvette Cobb to Duane Jones regarding MOU for UDC @PR Harris, dated 10/13/2006, including letter sent to Johnnie Landon from Veronica Falwell, dated 9/11/2006.
28. Agenda, Provost Meeting with the president on Workforce Development, 10/19/2006.
29. Interoffice Memorandum from Dr. Bobby Austin to Academic Affairs Committee, University of the District of Columbia, re: UDC Senate Ad Hoc Investigative Committee Report, dated 11/27/2006.
30. Letter from William Pollard to Stanley Jackson offering an Executive Appointment as Senior Vice President and Chief of Staff at UDC, dated 12/22/2006.
31. University of the District of Columbia Workforce Development Initiative Woodson Satellite Program, Plan for School Year 2007-2008, dated 18 June 2007.
32. Memorandum from Sydney O. Hall to Dr. William L. Pollard, dated 1/15/2007, regarding Meeting of Friday, January 12, 2007.
33. Agenda, Provost Meeting with the President, 1/22/2007.
34. Note from Sydney [Hall] to Dr. Pollard regarding Health & Physical Education program.
35. Agenda, Provost's Meeting with the President, dated 2/20/2007.

36. Letter from Sydney O. Hall and Wilmer L. Johnson to Dr. William Pollard, dated 3/2/2007.
37. University of the District of Columbia Workforce Development Initiative Woodson Satellite Program, Plan for School Year 2007-2008, dated 20 April 2007.
38. Agenda, Provost's Meeting with the President, dated 5/7/2007.
39. Memorandum from Sydney O. Hall to Ms. Reuben-Cooke, regarding University Senate Action sent for Disposition and Resolutions regarding UDC/NOVA Initiative, dated 3/26/2007.
40. Agenda, Meeting with Stan Jackson on Workforce Development, dated 5/18/2007.
41. Agenda, Provost's Meeting with the President, dated 5/31/2007.
42. Agenda, Provost's Meeting with the Senior Vice President, dated 5/31/2007.
43. University Senate, University of the District of Columbia, UDC Senate Resolution, dated 4/24/2007, regarding a vote of no confidence in William L. Pollard, President, and Wilhelmina Reuben-Cooke, Provost and Vice President for Academic Affairs.
44. Academic Affairs Request to Use a Portion of FY 2007 Lapsed Funding.
45. University of the District of Columbia, Reinvention of an Urban Institution, *Highlights of the Administration of William L. Pollard*, PhD, 2002-2007.
46. Agenda, Provost's Meeting with the Senior Vice President, dated 6/14/2007.
47. Letter from William Pollard to Stanley Jackson, dated 6/15/2007.
48. Email from Ms. Reuben-Cooke to William Pollard re: Transition and Provost Sabbatical, dated 6/29/2007.
49. Letter from James W. Dyke, Jr. to Stanley Jackson, dated 8/10/2007.
50. Agenda, Meeting with the President, dated 9/11/2007.
51. Notification of Personnel Action (pay adjustment) regarding Stanley Jackson, dated 11/8/2007.
52. Notification of Personnel Action (reassignment) regarding Stanley Jackson, dated 10/15/2008.

53. Memorandum from Wilhelmina M. Reuben-Cooke to Stan Jackson regarding Faculty Professional Development Date, dated 8/14/2007.
54. Letter from Stanley Jackson to Charles J. Willoughby, requesting an audit of the Workforce Development Program, dated 9/7/2007.
55. Letter from Charles J. Willoughby to Stanley Jackson, dated 9/13/2007.
56. Correspondence from Sydney O. Hall to Stanley Jackson, regarding initiation of adverse action proceedings against Ms. Reuben-Cooke, dated 9/14/2007.
57. Email chain between Stanley Jackson, Wilhelmina Reuben-Cooke and Carlynn Fuller regarding meeting re: SEAS issues and Dean, dated 10/2/2007 and 10/3/2007.
58. Data Verification Form 2004 Cohort, dated 10/11/2007.
59. Examiner.com article, by Bill Myers, dated 10/22/2007.
60. Examiner.com article, by Bill Myers, dated 10/24/2007.
61. Examiner.com article, by Jonetta Rose Barras, dated 10/25/2007.
62. Examiner.com article, by Bill Myers, dated 10/29/2007.
63. Email to Ms. Reuben-Cooke from glenarvon2007@yahoo.com, commenting on Examiner.com articles, dated 11/8/2007.
64. Email to Ms. Reuben-Cooke from glenarvon2007@yahoo.com, commenting on Examiner.com articles, dated 11/11/2007.
65. Email chain between Ms. Reuben-Cooke, Sandra Yates, Patricia Myers and Herman Prescott, II, regarding daily press clips provided to Board of Trustees, dated 10/24/2007.
66. Email chain between David Watts, Wilhelmina Reuben-Cooke and Stanley Jackson, regarding proceeding, dated 11/20/2007 and 11/21/2007.
67. Letter from Barbara Jumper to Shirley Jones, Special Pay Officer, regarding reversal of pay for Ms. Reuben-Cooke, dated 4/9/2008.
68. Grant Notification Award, U.S. Department of Education, for budget period 10/1/2007 – 9/30/2008.
69. Letter from Ernesta P. Pendleton, Ed.D. to James Gladden, Program Officer, regarding available balances, dated 3/8/2006.

70. Letter from Ernesta P. Pendleton, Ed.D. to James Gladden, Program Officer, regarding available balances, dated 2/20/2007.
71. Response (of Ms. Reuben-Cooke) to Certain Statements of Jonetta Rose Barras Regarding the Workforce Development Program.
72. Letter from Stanley Jackson to Ms. Reuben-Cooke, terminating her appointment as Provost and Vice President, Academic Affairs, dated 12/7/2007.
73. Annual Report to the Board, Workforce Development & Continuing Education FY2007.
74. Letter from Charles J. Willoughby to Stanley Jackson attaching draft report summarizing the results of the Office of the Inspector General's Audit of the Workforce Development Program, dated 2/29/2008.
75. Letter from Stanley Jackson to Charles Willoughby attaching response to the draft report of the Audit of the Workforce Development Program, dated 6/20/2008.
76. Audit of the Workforce Development Program, University of the District of Columbia, dated 7/9/2008.
77. University of the District of Columbia Financial Statement and Management Discussion and Analysis, September 30, 2006 and 2005.
78. University of the District of Columbia, The University Annual Report, 2002-2005.
79. University of the District of Columbia, Financial Statements and Management's Discussion and Analysis, September 30, 2007 and 2006.
80. Notice of continuing faculty appointment to Sydney Hall, dated 9/22/2006.
81. Notice of continuing faculty appointment to Wilhelmina Reuben-Cooke, dated 9/22/2006.
82. Request for Personnel Action regarding Johnnie A. Landon, dated 2/24/2006.
83. List of UDC Employees earning over \$100K, from Over Sight Hearing, 2/27/2008.
84. 2007 and 2008 W-2's for Wilhelmina Reuben-Cooke.
85. Testimony from D.C. City Counsel Hearing, dated 3/13/2007.
86. Testimony from D.C. City Counsel Hearing, dated 3/27/2007.
87. Testimony from D.C. City Counsel Hearing, dated 11/27/2007.

88. Testimony from D.C. City Counsel Hearing, dated 2/27/08.
89. Testimony from D.C. City Counsel Hearing, dated 4/11/2008.
90. Testimony from C.O.W. Public Hearing of the Council of the District of Columbia, dated 11/27/2007.
91. Defendant Board of Trustees of the University of the District of Columbia's Objections and Responses to Plaintiff's First Set of Interrogatories to Defendant Board of Trustees of the University of the District of Columbia, dated 2/17/2009.
92. Defendant Stanley Jackson's Objections and Responses to Plaintiff's First Set of Interrogatories to Defendant Stanley Jackson, dated 2/17/2009.
93. Defendant Examiner.com's Responses to Plaintiff's First Set of Interrogatories and First Request for Production of Documents, dated 2/17/2009.
94. Defendant Jonetta Rose Barras' Responses to Plaintiff's First Set of Interrogatories and First Request for Production of Documents, dated 2/17/2009.
95. Defendant Bill Myers' Responses to Plaintiff's First Set of Interrogatories and First Request for Production of Documents, dated 2/17/2009.
96. Defendant Board of Trustees of the University of the District of Columbia's Objections and Responses to Plaintiff's Second Request for Production of Documents to Defendant Board of Trustees of the University of the District of Columbia, dated 3/11/2009.
97. Defendant Jonetta Rose Barras' Supplemental Responses to Plaintiff's First Set of Interrogatories, dated 4/7/2009.
98. Defendant Bill Myers' Supplemental Responses to Plaintiff's First Set of Interrogatories, dated 4/7/2009.
99. Any exhibit(s) identified by Defendants Board of Trustees of the University of the District of Columbia, Stanley Jackson, Examiner.com, Jonetta Rose Barras, Bill Myers, Sydney O. Hall, Wilmer L. Johnson and/or Johnnie A. Landon, Jr. in their Pretrial Disclosures, and not objected to by the Plaintiff.

April 16, 2009

Respectfully Submitted,

/s/ CARLA D. BROWN

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of April 2009 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Thomas L. Koger, Esq.
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And I hereby certify that I will mail the document to the following non-filing user:

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